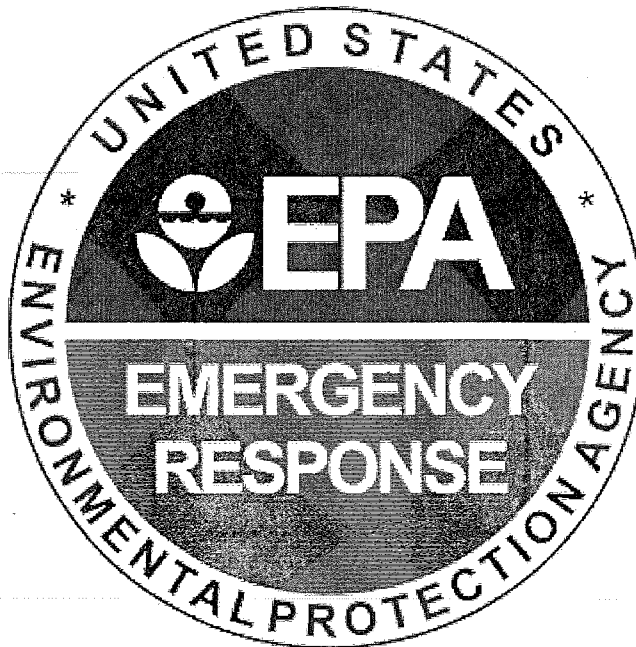


US EPA RECORDS CENTER REGION 5



466941

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Plastech Engineered Products - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #1
Initial
Plastech Engineered Products
C5L1
Andover, OH
Latitude: 41.6067211 Longitude: -80.5722960

To: Mark Johnson, ATSDR
Valencia Darby, Department of Interior
Scott Nally, OEPA
Wayne Babcock, U.S. Department of Interior
Robert Burr, U.S. Department of Interior
Sam Borries, U.S. EPA
Yolanda Bouchee-Cureton, U.S. EPA
Mindy Clements, U.S. EPA
Mark Durno, U.S. EPA
Jason El-Zein, U.S. EPA
Sherry Fielding, U.S. EPA
Charlie Gebien, U.S. EPA
John Glover, U.S. EPA
Thomas Marks, U.S. EPA
Mike Ribordy, U.S. EPA
Carol Ropski, U.S. EPA
Frank Zingales, Ohio EPA

From: Elizabeth Nightingale and Tricia Edwards, OSC
Date: 8/30/2013
Reporting Period: 8/26/13 - 8/30/13

1. Introduction

1.1 Background

Site Number:	C5L1	Contract Number:	
D.O. Number:		Action Memo Date:	4/29/2013
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	8/25/2013	Start Date:	8/26/2013
Demob Date:		Completion Date:	
CERCLIS ID:	OHN000510895	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time Critical Removal Action

1.1.2 Site Description

The site is an abandoned industrial property in a mixed residential/rural area in Andover, Ohio, and has a documented history of vandalism. The property is approximately 20 acres in size and contains a former manufacturing building of approximately 274,000 square feet and a southern parking lot. The site is bordered by a wooded area to the north and east, a creek and residential properties to the south, industrial and residential properties to the west. According to records from Ohio EPA, approximately 51 people reside within 0.5 miles of the site and 228 people reside within 1 mile of the site. An elementary school and library are located within 0.5 miles of the site. Pymatuning Valley Middle and High Schools are located one mile west of the site. The site is fenced, however not all gates are locked, allowing access by the public, potentially including neighborhood school children and trespassers. During the site assessment, EPA observed that several doorways and glass windows to the building had been damaged by vandalism. Other signs of vandalism were observed around the building, including graffiti, electrical transformer oil leaks onto the ground surface, and damage to electrical wiring in the building from unauthorized metal scrapping activities.

An unnamed creek along the southern site boundary flows east toward Pymatuning Reservoir located approximately 1.5 miles downstream of the site. Pymatuning Reservoir is a man-made lake approximately 26.7 square miles in size along the border between Ohio and Pennsylvania. Pymatuning Reservoir is part of the Shenango River watershed and is surrounded by Pymatuning State Parks in Ohio and Pennsylvania. Pymatuning Reservoir also serves as a local public water supply for residents in Ohio and Pennsylvania.

According to Ohio EPA, the site is located within a Source Water Protection Area for the Village of Andover. According to Ohio EPA, the public groundwater supply in Andover, Ohio, is highly susceptible to contamination because the source aquifer has a shallow depth to water of 12 to 25 feet below ground surface, the aquifer is not well-confined from surface infiltration; and potential contaminant sources are located within the Source Water Protection Area. The Village public water system supplies approximately 1,150 residents.

public water system draws from seven groundwater wells pumping approximately 186,000 gallons p

1.1.2.1 Location

The site is located at 205 Maple Street Extension, Andover, Ashtabula County, Ohio, 44003. The loc coordinates are latitude 41.61278° and longitude - 80.56873°. The site is bounded by a wooded area north and east, a creek and residential properties to the south, and industrial and residential propertie west.

1.1.2.2 Description of Threat

Uncontrolled hazardous substances including reactive oxidizers, toxic substances and highly caustic substances were documented on site during the site assessment. Many waste containers are in poor c and there are signs of leakage or spillage on nearby floor surfaces inside the building. Oil-stained su and vegetation was observed surrounding three electrical transformers outside the building. During th assessment, signs of unauthorized access to the site property and building were observed.

Uncontrolled hazardous substances at the site could be released to soil and groundwater, the atmosp nearby surface waterways. Potential exposure through each of these migration pathways could cause imminent endangerment to human health, welfare, or the environment. These chemicals could be in children and pets; tracked off-site by visitors and trespassers; and spread throughout the area, into res homes, and businesses. Release of these chemicals could impact the shallow groundwater aquifer us community as a source of drinking water. There is a potential for direct contact with the hazardous st because the site is bordered by a residential neighborhood and within half a mile of an elementary sc public library.

Overall, the potential for exposure to hazardous substances stored at the site is high, especially consi that the on-site building is no longer occupied and vandals have accessed the interior of the facility.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Characteristically corrosive, toxic and reactive wastes were documented on site, as well as high atm levels of VOCs in former painting areas. Seven total samples were collected from among the 23 dru small containers, four transformers, and sumps and trenches that were observed on site. The content majority of the remaining containers is unknown, as most were unlabeled.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

During previous inspections and assessments, known or suspected hazardous substances, pollutants or contaminants were identified in 8 areas:

- Area 1** – former paint mixing area (3,860 square feet in area) in the northwest corner of the former manufacturing building with in-floor sumps and trenches;
- Area 2** – small (1,670 square feet) open courtyard between structural additions of the former manufacturing building; includes a small storage outbuilding and a caged electrical transformer on a concrete pad;
- Area 3** – large (40,000 square feet) raw material warehouse and storage area at the northeast corner of the former manufacturing building;
- Area 4** – small (780 square feet) outbuilding near the southern property line filled with parts and containers;
- Area 5** – outdoor transformer cage and concrete pad (1,450 square feet) at the southeastern corner of the former manufacturing building;
- Area 6** – large (19,000 square feet) centrally-located room that formerly housed hydraulic plastic molding equipment; includes in-floor sumps and trenches for hydraulic oil;
- Area 7** – small (1,350 square feet) storage room in the north side of the former manufacturing building containing drums; and
- Area 8** – former paint line loading area and finishing room (14,800 square feet) in the western side of the former manufacturing building.

EPA inspectors documented a total of 23 drums containing an estimated total of 437 gallons of abandoned wastes at the site. All drums were located inside the manufacturing and outbuildings. Samples were taken from three drums. Two of the drums contained liquid, and one contained a solid material. All three drums were analyzed for flashpoint, corrosivity (pH), toxicity characteristic leaching procedure (TCLP) metals, TCLP volatile organic carbons (VOCs), and TCLP semi-volatile organic carbons (SVOCs). The first drum had a pH of 14 SU, which exhibits the characteristic of corrosivity within the definition of C.F.R. § 261.22(a)(1). TCLP lead was detected at 8.9 milligrams per liter (mg/L) in the second drum, which exceeds the toxicity characteristic limit for lead of 5.0 mg/L. All other results for samples taken from drums were below the respective reporting limits or applicable regulatory limits.

In addition to the 23 drums, 40 small containers were documented at the site. A liquid sample was collected from one small container, and analyzed for the same parameters as the drum samples. All results for this sample were below the respective reporting limits or applicable regulatory limits. A solid sample was collected from another small container that was labeled as an oxidizer. This sample was identified using Smiths Detection HazMatID 360 and an Ahura FirstDefender as 1,3-dichloro-5,5-dimethylhydantoin, trade name of Dakin. The material is a water-reactive, combustible solid that easily oxidizes, is reactive with xylene, and can produce toxic fumes in reaction to water. According to 40 C.F.R. § 261.22(a), waste is characteristically reactive when it has violent reactions with water or generates dangerous toxic fumes when mixed with water.

Area 1 contains three in-floor sumps and trenches containing suspected paint sludge. During the site assessment, strong organic vapor odors and field screening readings near 400 ppm total VOCs were observed. Directional flow was not observed in the sumps and trenches, and it is unknown whether these drains are part of a closed network. Spent spray booth filters were also observed inside a partially-dismantled former abatement system outside the northern side of the building. A liquid sample was collected from a sump in Area 1 and analyzed for flashpoint, corrosivity (pH), TCLP metals, TCLP VOCs, TCLP SVOCs, and polychlorinated biphenyls (PCBs). All results for this sample were below the respective reporting limits or applicable regulatory limits. Sumps and trenches in Area 6 were not sampled.

Four large electrical transformers in Areas 2 and 5 containing an estimated maximum total of 1,200 gallons of oil were observed at the site. In Area 5, surface soil, vegetation and the concrete pad around the transformers were coated with liquid oil. Samples of the oil within a transformer in Area 5 and the soil below it were collected and analyzed for PCBs. Aroclor 1260 was detected at 3.9 mg/kg in the liquid oil sample. This is below the Toxic Substances Control Act regulatory limit of 50 ppm for electrical transformers. Aroclor 1260 was detected in the soil sample at a concentration of 0.43 mg/kg. This result is below the State Generic Direct Contact regulatory limit of 18 mg/kg for soil on industrial and commercial properties. Transformers in Area 2 were not sampled.

This removal action will involve properly identifying, consolidating, and packaging hazardous materials at the site. The consolidated materials will be removed and ultimately disposed of off-site. Additional site actions may include security, perimeter air monitoring, and decontamination on the site, as needed to complete removal action. This response action will be conducted in accordance with Section 104(a)(1) of CERCLA, U.S.C. § 9604(a)(1) and Section 300.415 of the NCP, 40 C.F.R. § 300.415, to abate or eliminate the immediate threat posed to public health and/or the environment by the presence of the hazardous substances. No uncontrolled hazardous substances are expected to remain at the site once the removal action is completed.

2.1.2 Response Actions to Date

Overall Summary:

- Area 1** — Area has been fully addressed. Cleaning and removal of waste from trenches and sumps in this area was fully completed.
- Area 2** — Sample of waste oil collected from transformer. Transformer will be pumped out during the week of 9/3/13.
- Area 3** — Area has been fully addressed. All containers were removed, characterized and staged for disposal.
- Area 4** — All containers with any remaining content were removed, characterized and staged for disposal. Several remaining empty containers will be collected next week and crushed for disposal.
- Area 5** — Transformer carcasses were not found to contain oil at the time of removal start. Approximately 2 gallons of waste oil from transformer switchgear was removed for disposal. Oily debris below transformers will be removed next week.
- Area 6** — Area has been fully addressed. Waste material was removed from 3 in-floor sumps and trenches and staged for disposal.
- Area 7** — Area has been fully addressed. All containers were removed, characterized and staged for disposal.
- Area 8** — Area has been fully addressed. All containers were removed, characterized and staged for disposal.

Air Monitoring:

Air monitoring will be conducted daily throughout the site building and around areas where the crew is working. MultiRAE Plus 5-gas monitor and PDR particulate monitor. Action levels have been established. No exceed any action levels occurred over the week of 8/26/13.

Daily Activity Summary:*August 26, 2013*

The crew began work at the site on August 26, 2013. An initial walkthrough was conducted, and logistical arrangements, equipment mobilization, site clearing and site setup activities were completed. Work to set up a zone, an exclusion zone (EZ) and contamination reduction zone (CRZ) was initiated. Contact was made with the police department and Village Administrator regarding EPA activities at the site. The health and safety plan (H) was finalized. The emergency contingency plan was drafted.

Air monitoring was conducted throughout the site building. Air monitoring results throughout the building did not exceed background levels.

August 27, 2013

Work to set up the EZ and CRZ was completed. The emergency contingency plan was finalized and delivered to police and fire departments. After review and signoff on the HASP, the crew began work to collect containers throughout the facility, and stage them in a central location near the CRZ. The crew gathered and staged 10 empty drums with waste contents, 48 small containers with waste contents, 6 near-empty drums, 2 near-empty small containers, 2 empty carbon dioxide cylinders, and approximately 28 mercury switches. One leaking drum was found in an over pack drum before being moved to the container staging area.

The crew also removed mercury switches from thermostats located throughout the site building. EPA, ERRS, and START then conducted a walkthrough of the Site to look for additional containers not previously identified, gathered, and staged.

Air monitoring was conducted throughout the site building. Air monitoring results throughout the building did not exceed background levels except in Area 7, where volatile organic compound (VOC) readings were elevated due to the leaking drum (that was subsequently overpacked).

August 28, 2013

The crew conducted a final walkthrough of the Site to look for any additional containers not previously identified. The crew collected intact fluorescent bulbs from readily accessible locations. The remaining containers were gathered, and 42 bulbs were collected. After assessment of labels, condition, and contents of containers, it was determined that 12 drums and 23 small containers needed further characterization. XX samples were collected from these containers for characterization. A sample was also collected from one of the previously unsampled transformers on site. A composite sample was collected from the trenches and sump in Area 1. Lab services were procured. The crew mobilized to the site to begin characterization of containers.

Air monitoring was conducted throughout the site building. Air monitoring results throughout the building did not exceed background levels. Air monitoring was also conducted during collection of samples from containers, with a maximum of 6.0 ppm total VOCs detected in the breathing zone.

August 29, 2013

The crew donned Level C PPE and used hand tools to remove dried paint and solvents from shallow trenches and sumps in Area 1 and transferred the contents into 55-gallon drums for transport and off-site disposal. The crew began characterization of containerized wastes. 28 samples were characterized.

Air monitoring was conducted throughout the site building. Air monitoring results throughout the building did not exceed background levels.

background levels. Air monitoring was also conducted during cleaning of trenches, with a maximum of 4.6 ppm VOCs detected in the breathing zone.

New overpack drums were delivered to the site for containerization of wastes for transport and off-site disposal. A universal waste container was delivered to the site for packaging of unbroken fluorescent bulbs gathered on August 28, 2013.

A representative from the Northeast District Office of the Ohio EPA visited the site to observe the removal action conducted by EPA and inspected the site buildings.

August 30, 2013

The crew finished scraping paint and solvents from the sumps and trenches in Area 1 and swept up granular material. 2 drums of waste were created.

A drum pump was used to remove waste oil from shallow in-floor trenches and sumps in Area 6 and a small run for a motor south of Area 6. 20 gallons of waste were generated.

The crew also pumped waste oil from transformer switchgear in Area 5 and transferred the waste oil into a 55 steel drum for transport and off-site disposal.

The crew began containerizing waste into DOT shippable containers. The vast majority of the containers were into a locked conex box for secure storage.

The ERRS chemist finished HAZCAT analyses for determination of disposal waste streams and demobilized from site. 11 total waste streams were identified - 6 based on sample characterization, 3 based on MSDSs for unknown containers, 1 for mercury (mercury containing switches), and 1 for fluorescent bulbs. Recyclable paper and packaging generated by the crew during the removal action will also be disposed of.

Waste samples were shipped to the lab for analysis.

Air monitoring was conducted throughout the site building. Air monitoring results throughout the building did not exceed background levels.

Site was secured for the holiday weekend.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Efforts are ongoing to further develop information and continue to pursue enforcement activities.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

Planned removal activities on-site include:

1. Developing and implementing a site-specific Health and Safety Plan, including an Air Monitoring Plan site Emergency Contingency Plan;
2. Developing and implementing a Site Work Plan that includes a Site Security Plan;
3. Securing, characterizing, and sampling suspected hazardous substances, contained or uncontained, compliance with a site-specific quality assurance/quality control (QA/QC) Plan;
4. Addressing other contaminated media in accordance with Applicable, Appropriate, and Relevant Requirements to the extent practicable;
5. Consolidating and packaging hazardous substances, pollutants and contaminants for transportation and disposal;
6. Decontaminating contaminated structures as necessary;
7. Transporting and disposing of all characterized or identified hazardous substances, pollutants, wastes and contaminants that pose a substantial threat of release at a Resource Conservation and Recovery Act approved disposal facility in accordance with EPA's Off-site Rule (40 C.F.R. § 300.440), as applicable;
8. Taking any other response actions to address a release or threatened release of hazardous substance, pollutant or contaminant that the U.S. EPA OSC determines may pose an imminent and substantial endangerment to the public health or the environment.

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

Over the weekend beginning August 30, 2013, one member of the crew will stop by the site several times per week to ensure that waste and equipment have not been tampered with. The police department is also doing nightly patrols of the site.

The full crew will remobilize to the site on Tuesday September 3, 2013. During the week, we plan to:

1. Remove, and secure and prepare waste oil from transformer in Area 2 (approximately 900 gallons) for disposal.
2. Crush and cut empty containers for disposal.
3. Prepare remaining small containers for disposal.
4. Collect and consolidate remaining misc. known or suspected small sources of hazardous waste from facility.
5. Remove oiled vegetation from around transformers in Area 5.
6. Securing all remaining waste within the conex box until final disposal is completed.

We anticipate remobilizing to the site sometime after sample analysis results are returned on September 17, 2013. Disposal is arranged to complete final disposal of waste.

2.2.2 Issues

2.3 Logistics Section

ERRS is managing site logistics.

2.4 Finance Section

2.4.1 Narrative

ERRS costs are estimated through August 29, 2013. START costs are estimated through August 30, 2013.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$200,000.00	\$23,125.00	\$176,875.00	88.44%
TAT/START	\$25,000.00	\$7,350.00	\$17,650.00	70.60%
Intramural Costs				
Total Site Costs	\$225,000.00	\$30,475.00	\$194,525.00	86.46%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Cost accounting data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff**2.5.1 Safety Officer**

The OSCs are serving in this role for the site.

2.5.2 Liaison Officer

The OSCs are serving in this role for the site.

2.5.3 Information Officer

The OSCs are serving in this role for the site.

3. Participating Entities**3.1 Unified Command**

n/a

3.2 Cooperating Agencies

Ohio EPA

Andover Police Department

Andover Fire Department

4. Personnel On Site

Personnel on site on 8/26/13:

EPA: 2

START: 1

ERRS: 5

Andover Police Department: 2

Personnel on site on 8/27/13:

EPA: 1

START: 1
ERRS: 5

Personnel on site on 8/28/13:

EPA: 1
START: 1
ERRS: 5

Personnel on site on 8/29/13:

EPA: 1
START: 1
ERRS: 6
Ohio EPA: 1

Personnel on site on 8/30/13:

EPA: 1
START: 1
ERRS: 6

5. Definition of Terms

ATSDR	Agency for Toxic Substances and Disease Registry
BZ	Breathing Zone
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
DNR	Department of Natural Resources
EPA	Environmental Protection Agency
ERNS	Emergency Response Notification System
ERRS	Emergency and Rapid Response Service
NG/M ³	nanograms per cubic meter
NCP	National Oil and Hazardous Substance Pollution Contingency Plan
NOAA	National Oceanic and Atmospheric Administration
NPL	National Priorities List
NRC	National Response Center
OSC	On Scene Coordinator
PPE	Personal Protective Equipment
PPM	Parts per million
RCRIS	Resource Conservation and Recovery Act Information System
RP	Responsible Party
RRT	Regional Response Team
START	Superfund Technical Assessment and Response Team
US FWS	United States Fish and Wildlife Service
USCG	United States Coast Guard

6. Additional sources of information

6.1 Internet location of additional information/report

www.epaossc.org/plastech

6.2 Reporting Schedule

POLREPs will be issued weekly doing the removal action.

7. Situational Reference Materials

n/a